

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MARIA A. REEZE, )  
                       )  
Plaintiff,          )      No. 08 C 129  
                       )  
vs.                 )      Judge Hart  
                       )  
HOME DEPOT U.S.A., INC. d/b/a      )      Magistrate Judge Brown  
THE HOME DEPOT,     )  
                       )  
Defendant.          )

**MOTION TO EXTEND THE ALL DISCOVERY CLOSURE DATE**

NOW COME the Plaintiff, MARIA REEZE, by and through her attorneys, GOLDSTEIN, BENDER & ROMANOFF, and moves this Honorable Court for an Order extending the All Discovery Closure Date, and in support thereof, states as follows:

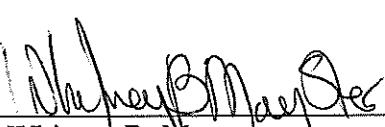
1. This case involves a trip and fall that occurred on December 23, 2005 at the Home Depot located at 700 Broadway Village Square, Village of Broadview, State of Illinois.
2. In the above referenced incident, Plaintiff suffered a fracture and nerve trauma in her right hand that required surgery and subsequent follow-up care.
3. On October 4, 2007, Plaintiff filed a Complaint at Law in the Circuit Court of Cook County, Illinois.
4. On January 7, 2008, Plaintiff received a Notice of Removal pursuant to 28 U.S.C. 1441 *et seq.*
5. Since removing the case to the United States District Court for the Northern District of Illinois, both parties have issued discovery.
6. Plaintiff's counsel, in attempting to complete the discovery requests propounded by Defendants, has recently learned from the Plaintiff that she has undergone recent treatment and might require an additional surgery.
7. Based upon the recent developments regarding Plaintiff's additional treatment and possible surgery, it is not feasible for all of the discovery in this matter to be completed by April 22, 2008 as previously ordered by this Court.

8. Plaintiff will be greatly prejudiced if forced to proceed without all of the documentation relating to Plaintiff's injury and medical treatment.
9. Defendant will not suffer undue prejudice if the All Discovery Date of April 22, 2008 is extended.

WHEREFORE, Plaintiff prays that this Honorable Court enter an Order extending the All Discovery Closure Date, in light of the recent developments, in order to allow the Plaintiff to acquire all the documentation necessary to present her claim for damages.

Respectfully submitted,

By:



Whitney B. Mayster  
Goldstein, Bender & Romanoff  
One N. LaSalle Street, 26<sup>th</sup> Floor  
Chicago, Illinois 60602  
(312) 346-8558